

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. _____
	)	
vs.	)	
	)	
DANIEL LEE JACQUEZ,	)	No. 15-CR-1515 RB
TOBY CHAPIN PADILLA,	)	
JUDAH GRANDE MONDELLO,	)	
ERIC JAMES RUIZ,	)	
GILBERT J. MORENO,	)	
a.k.a. "Gibby,"	)	
ANTHONY R. DAVILA,	)	
a.k.a. "Weasel,"	)	
GARY LEE ROMERO, JR.,	)	
CRYSTAL MEDINA GOMEZ,	)	
KEVIN R. CARTER, and	)	
FREDDY J. LUCERO,	)	
	)	
Defendants.	)	

**SECOND UNOPPOSED MOTION TO CONTINUE TRIAL AND PRE-TRIAL  
DEADLINES**

The United States respectfully moves the Court for a 90 day continuance of the trial date and all pre-trial deadlines in this matter. As grounds therefore, the government states as follows:

1. Pursuant to 18 U.S.C. § 3161(h)(7)(A), this case was designated as complex on May 26, 2015. Doc. 104. Accordingly, the time between the entry of that Order and the trial date is excluded for the purposes of the Speedy Trial Act computation.

2. Trial is currently set for June 28, 2016. Doc. 206. Counsel for the government is currently scheduled for trial on March 28, 2016, in *United States v. Jesus Antonio Bustillos-Ramirez* (15-CR-4405 KG).

3. Counsel for the government contacted all counsel for all defendants still pending trial. All defense counsel except counsel for Gilbert Moreno indicated that they have no objection to the motion. Counsel for the government was unable to reach counsel for Gilbert Moreno before filing.

For the reasons discussed about, the government respectfully requests a 90 day continuance of the trial and all pre-trial deadlines.

Respectfully submitted,

DAMON P. MARTINEZ  
United States Attorney

*Electronically filed 3/22/2016*  
ANNA R. WRIGHT  
Special Assistant U.S. Attorney  
555 S. Telshor, Ste. 300  
Las Cruces, NM 88011  
(575) 522-2304 - Tel.  
(575) 522-2391 – Fax

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record.

/s/

---

ANNA R. WRIGHT  
Special Assistant U.S. Attorney